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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING JOINT
SUBMISSION RE: SEALING PORTIONS
OF THE MARCH 2, 2023 HEARING
TRANSCRIPT REGARDING ORDER TO
SHOW CAUSE**

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is the parties' Joint Submission to Seal Portions of the Court's March 2, 2023 Sealed Transcript of Proceedings regarding Order to Show Cause.

Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
March 2, 2023 Sealed Transcript of Proceedings	<p>GRANTED as to the portions at:</p> <p>Highlighted portions at pages 7:13-15, 7:20, 8:4, 9:19-21, 9:23, 10:15, 10:17, 12:7, 13:3, 14:2, 14:11-12, 14:14, 14:16, 14:19, 19:1, 19:8, 19:13, 19:19, 20:18, 21:24-22:1, 22:3, 22:5, 22:10, 22:12-13, 22:20, 22:23-25, 23:5, 23:9-10, 23:18-19, 25:7-14, 26:11, 27:1, 28:2, 29:22, 32:4, 32:11-12, 33:19-20, 36:10, 36:13, 36:18, 37:5, 39:1, 39:14, 40:8, 40:10, 40:13, 41:12-13, 41:17, 41:19-21, 42:6-12, 42:14-16, 43:3, 44:15, 46:23, 47:16, 47:22-23, 48:13, 48:19, 51:17, 56:18, 60:24, 61:3-4, 61:7, 61:9, 61:14-16, 61:25, 62:2, 62:4, 62:13, 64:13, 64:16-18, 65:22-24, 66:1, 66:6, 67:15, 68:2, 71:14, 72:15, 74:9, 74:19, 74:24, 75:13, 75:19, 75:22-76:2, 76:5-6, 76:24, 77:20, 78:2, 78:7, 78:21, 79:1, 79:6,</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal project code names, internal team names, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>

79:12, 83:5-6, 83:8,
 83:10-11, 83:14-16,
 83:19-20, 83:23-84:3,
 86:17, 87:1, 87:7,
 87:17, 88:9, 88:13,
 90:2, 90:16, 90:24,
 91:19, 92:18, 92:21,
 93:25, 94:2-3, 94:5,
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 100:13, 101:21-22,
 102:16, 103:10, 103:13,
 103:19, 106:9, 106:11-
 12, 106:17-18, 106:20-
 22, 107:23-108:1,
 109:20, 112:12, 113:2-
 3, 114:20, 115:13,
 115:23

SO ORDERED.

DATED: _____

 HON. SUSAN VAN KEULEN
 UNITED STATES MAGISTRATE JUDGE